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February 4, 2016

Via Mail

Regional Freedom of Information Officer
U.S. EPA, Region 4
AFC Bldg., 61 Forsyth Street, S.W., 9th Floor (4PM/IF)
Atlanta, GA 30303-8960

Re: Freedom of Information Act (FOIA) Request

Dear Sir/Madam:

This is a request under the Freedom of Information Act, 5 U.S.C. 552, to the United States Environmental Protection Agency, Region 4 ("USEPA").

This request seeks documents regarding the following two sites:

Name of Facility: Norfolk Southern Railroad Refueling Site(s) or
Norfolk Southern Solid Waste Disposal Area or
Southern Railway Solid Waste Disposal Area

Location: Meridian, Mississippi (Lauderdale County)

-and-

Name of Facility: Former Coster Shop or
Coster TBT Facility or
Thoroughbred Bulk Terminal Facility

Location: Knoxville, Tennessee (Knox County)

Specific information requested: This request relates to the present or former ownership and/or operation of the sites by Norfolk Southern Corporation or Southern Railway Company. The request seeks the following documents:

1. Any and all documents related to the investigation, study, and/or remediation of any chemicals, organic compounds, inorganic compounds, or contaminants at or near the sites;
2. Any and all reports relating to the sites, including but not limited to site investigation reports, work plans, corrective action plans, site characterization reports, site management plans, environmental health & safety plans, and soil, groundwater, or surface water investigations or assessments;
3. Any and all documents related to any environmental or safety hazards posed by the operations of Norfolk Southern Corporation or Southern Railway Company in the States of Mississippi or Tennessee;
4. Any and all documents related to any environmental or safety inspections of Norfolk Southern Corporation or Southern Railway Company in connection with their storage, handling, use, or disposal of any chemicals, contaminants, or hazardous materials;
5. Any and all documents related to any environmental hazards or consequences to properties surrounding the sites as a result of the operations of Norfolk Southern Corporation or Southern Railway Company;
6. Any and all documents and communications between USEPA, its agents or representatives, and Norfolk Southern Corporation or Southern Railway Company, or their employees, agents, representatives, lawyers, or consultants, regarding environmental issues or operations taking place at or near the sites; and
7. Any and all documents regarding any complaints, including any environmental-related complaints, or orders, issued against or to Norfolk Southern Corporation or Southern Railway Company regarding the sites.

If possible, please provide electronic copies of the requested documents to the undersigned via e-mail, mbalch@buddlerner.com or by mail, Michael J. Balch, Budd Lerner, P.C., 150 JFK Parkway, Short Hills, NJ 07078. Please be advised that the undersigned will pay all appropriate fees in connection with this FOIA request up to a maximum of \$500. If you estimate that the fees will exceed that amount, please notify me. If the volume of requested documents requires an in-person visit for inspection and copying, please contact me to arrange such a visit.

Thank you for your cooperation in responding to this request. Please contact me by e-mail or phone if you have any questions about the foregoing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'MJB', is positioned above the printed name.

Michael J. Balch